CYCLE II EXTERNAL
ENVIRONMENTAL COMPLIANCE ASSESSMENT
PRELIMINARY FINDINGS REPORT

EDWARD MACDOWELL LAKE
PETERBOROUGH, NEW HAMPSHIRE

U.S. Army Corps of Engineers
New England District
424 Trapelo Road
Waltham, Massachusetts
02254-9149

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US Army Corps of Engineers

New England District

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MEMORANDUM FOR Environmental Compliance Coordinator, NAE

SUBJECT: Environmental Compliance Assessment of Edward MacDowell Lake

1. Attached please find the Cycle II Preliminary Findings Report for the environmental compliance assessment conducted at Edward MacDowell Lake on 24 April 1997.

2. A draft report was prepared and furnished to the Basin and Project Managers for comment on 25 June 1997. Their comments have been incorporated into the final report.

3. I recommend your approval for implementation.

Jeff Deyette
Operations Technical
Support Section

Encl

CMT 2

1. Environmental Compliance Assessment of North Springfield Lake is:

Approved X Disapproved _____ for implementation as stated.

Bruce Williams, ECC
Operations Technical
Support Section

EXECUTIVE SUMMARY

An environmental compliance assessment of Edward MacDowell Lake was conducted by a team of New England District environmental professionals on 24 April 1997. This was a Cycle II External Assessment. The Cycle I External Assessment was conducted on 14 October 1993.

The assessment was conducted as part of the U.S. Army Corps of Engineers Environmental Review Guide for Operations (ERGO) program. The ERGO program, developed by the U.S. Army establishes the use of environmental compliance assessments to ensurecompliance with all applicable Federal, state, local, Department of Defense, and U.S. Army environmental laws and regulations.

A comprehensive ERGO assessment considers 13 major environmental compliance categories. For each category, Federal, State and local laws, Department of Defense and U.S. Army Corps of Engineers regulations, and good management practices are reviewed.

Overall the project was well maintained and organized. The summary of deficiencies at Edward MacDowell Lake is as follows:

Significant Deficiencies - 0
Problems that pose a direct and immediate threat to human health, safety, the environment or the facility's mission, and require immediate attention.

Major Deficiencies - 0
Problems that require action, but not necessarily immediate action, and pose a threat to human health, safety or the environment.

Minor Deficiencies - 8
Deficiencies that are usually administrative in nature. These problems require monitoring or planning for future mitigation.

Management Practice - 1
Items noted are not specifically covered by a distinctive regulatory requirement; however, they still require management attention.

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THE ERGO PROGRAM

The U.S. Army Corps of Engineers initiated the Environmental Review Guide for Operations (ERGO) program as a comprehensive self-evaluation and program management system for achieving, maintaining, and monitoring compliance with environmental laws and regulations at Corps of Engineers projects and facilities. Objectives of the ERGO program are to:

1) Enhance Corps of Engineers environmental compliance at Federal, State and local levels.

2) Improve Corps of Engineers environmental management.

3) Build supporting financial programs and budgets.

4) Assure supervisors that their environmental programs are being implemented effectively in accordance with Corps of Engineers goals and objectives.

Periodic environmental compliance assessments have been deemed necessary. These evaluations are designed to assess environmental compliance and provide necessary feedback to Project Managers for organizing, directing, and controlling environmental compliance and protection activities.

New England District's (NAE's) ERGO program became operational in 1991. Because it is responsible for the majority of USACE facilities, Construction/Operations Directorate is tasked with the development and implementation of the ERGO program. Every five years, each NAE project undergoes an external environmental compliance assessment. This assessment is conducted by a team of environmental professionals. Every NAE project has already had one external environmental compliance assessment. The assessment described in this report is the second external assessment for this project, and is therefore known as a Cycle II External Environmental Compliance Assessment. The project itself is responsible for performing an internal self-assessment annually, with the exception of those years when an external assessment is being completed.

ASSESSMENT PROCEDURES

The ERGO assessment of Edward MacDowell Lake was conducted by an eight person team comprised of NAE personnel, and took place on 24 April 1997. The team followed a three phase approach. The first phase was to obtain pre-assessment information concerning on-site activities (see Appendix A - Previsit Questionnaires) and research applicable Federal, State and local environmental regulations. This culminated in the development of site/facility-specific categories. In addition, a list of environmental compliance issues identified by the ERGO Program Manager as areas of special emphasis was distributed to the Project Manager prior to the on-site visit (see Appendix B - Special Emphasis Areas List).

The second phase involved the on-site portion of the assessment. This involved an interview with project staff, followed by a facility tour, including major outgrants, to obtain a general overview of the facility operations. Typically, the Project Manager briefed the ERGO team on compliance with the special emphasis areas list and initiated discussion concerning any further compliance issues. Once the initial interview with project staff concluded, the ERGO team visited areas of the facility deemed necessary. When possible, all deficiencies were reported to facility personnel. The team concluded the on-site portion of the assessment by briefing the project staff to apprise them of the review team's preliminary findings.

The third phase involves writing a draft report and developing an action plan for addressing outstanding deficiencies. The evaluation of Edward MacDowell Lake followed the above procedures and covered the elements set forth in the 13 ERGO compliance categories.

The assessment was conducted in accordance with the best professional judgement of the ERGO team members. It should be understood that the assessment is based on observations taken over a short span of time relative to the period under review. Efforts were directed toward reviewing major facets of environmental performance in the period covered and, therefore, it is important to recognize that this assessment may not necessarily identify all potential problems.

Successful completion of the site-specific environmental evaluation of Edward MacDowell Lake was dependent on complete disclosure by project staff and outgrantees of all information regarding the operation and maintenance activities at the project. It should be noted that failure of a manager to provide complete or adequate information to the review team does not relieve the manager of the responsibility for compliance with environmental regulations.

ERGO PROGRAM OBJECTIVES

The Environmental Review Guide for Operations (ERGO) program guidance is embodied primarily in two publications: The Environmental Assessment and Management (TEAM) Guide, applicable to participating DoD components, including the U.S. Army Corps of Engineers (USACE), and the Supplement to The Environmental Assessment and Management (TEAM) Guide, applicable to Corps of Engineers Civil Works activities, operating projects and floating plant, including outgranted lands and concessions. In addition, state-specific supplements are available for some states.

Objectives of the TEAM Guide are as follows:

1. Compile applicable Federal regulations with DoD component operations and activities.

2. Synthesize environmental regulations, management practices, and risk management issues into consistent and easy to use checklists.

3. Serve as an aid in the assessment process and management action development phases of DoD component environmental assessment programs.

Objectives of the Supplement to the TEAM Guide are as follows:

1. Compile applicable DoD regulations, and Engineer Regulations (ERs) associated with USACE operations and activities.

2. Synthesize regulations, management practices, and risk management issues into consistent and easy-to-use checklists.

3. Serve as a reference document and educational tool for daily operations.

4. Serve as a guide for implementing the U.S. Army Environmental Strategy Into the 21st Century, which emphasizes environmental stewardship as an integral of everything the USACE does.

DESCRIPTION OF REGULATORY COMPLIANCE

This section of the report presents a summary of findings in those categories that are governed by engineering regulations, engineering manuals, and Federal, state, and local regulations. Non-regulatory items, which are referred to in this report as management practices, are of a lower priority but require attention to correct.

Deficiencies noted in this evaluation will be categorized as follows:

SIGNIFICANT DEFICIENCY:

A problem categorized as significant requires immediate attention. It poses, or has a high likelihood to pose, a direct and immediate threat to human health, safety, the environment, or the facility's mission.

MAJOR DEFICIENCY:

A major deficiency requires action, but not necessarily immediate action. Major deficiencies may pose a threat to human health, safety or the environment. Any immediate threat, however, must be categorized as significant.

MINOR DEFICIENCY:

Minor deficiencies are usually administrative in nature, even though those findings might possibly result in a notice of violation. This category may also include temporary or occasional instances of noncompliance.

MANAGEMENT PRACTICE:

Management practice items are those for which there is no specific regulatory requirement; however they still require management attention.

SUMMARY OF DEFICIENCIES BY CATEGORY

Edward MacDowell Lake

ERGO Compliance Categories	Findings			
	Significant	Major	Minor	Management Practice
Air Emissions Management	0	0	0	0
Cultural Resources Management	0	0	1	0
Hazardous Materials Management	0	0	0	0
Hazardous Waste Management	0	0	0	0
Natural Resources Management	0	0	3	1
Other Environmental Issues	0	0	1	0
Pesticide Management	0	0	0	0
POL Management	0	0	1	0
Solid Waste Management	0	0	1	0
Storage Tank Management	0	0	0	0
Toxic Substances Management	0	0	1	0
Wastewater Management	0	0	0	0
Water Quality Management	0	0	0	0
Totals	0	0	8	1

AIR EMISSIONS MANAGEMENT

No Findings

CULTURAL RESOURCES MANAGEMENT

Cultural Resources Management

Narrative -

Edward MacDowell Lake is currently scheduled for an archaeological reconnaissance survey during FY 1999. This survey and resulting report should provide NAE with a prehistoric and historical background overview of the study area together with the development of an archaeological sensitivity map of the project based on the presence of certain variables including soil types, slope, proximity to water source, etc. This model will then be tested through the use of archaeological testing of 50 x 50 cm test pits through the areas of sensitivity in order to confirm or refute the sensitivity model. Any archaeological sites found during this study will be documented. Recommendations will be made for the proper cultural resource management of prehistoric and historic archaeological resources within Edward MacDowell Lake. The sensitivity mapping can then be used as a planning tool to guide future development or construction and the possible need for further archaeological study or evaluation.

Aside from the need for an archaeological reconnaissance and inventory survey as a first step in the proper management of cultural resources for Edward MacDowell Lake, no other issues of concern regarding cultural resources were noted or raised by the Project Manager or his staff. It is recommended that prior to any of the following management activities, an NAE archaeologist be consulted: new agricultural leases, new wildlife food plots, construction of restroom facilities, picnic shelters or recreational areas, parking lot expansion, new sand or gravel mining areas, timber removal using heavy equipment, real estate outgrants, activities which disturb the topsoil, and other special use permits which may disturb areas. At the conclusion of the archaeological recon, project staff will have information concerning documented archaeological sites and potentially sensitive areas of Edward MacDowell Lake. This information will facilitate review of the above activities and form the basis for a more intensive survey of particular sites or areas of the project area and for evaluating sites which may be significant and eligible for listing on the National Register of Historic Places.

Project staff should periodically monitor the study area and become familiar with signs of archaeological evidence including bridge remains, old roads, foundations, cellar holes, wells, fieldstone walls, ornamental trees, mill sites including dams, head and tailraces and other man-made modifications (historic sites) and stone tool chipping debris, projectile points ("arrowheads"), bones, fire pits, clay pots, and stone tools (prehistoric sites). Staff should also monitor for erosion from flooding, the looting of cultural resources from river banks or other areas (bottle hunting), and for damage to the soil from offroad all-terrain vehicles or trails. Recently plowed fields and low reservoir pools are also of interest as evidence of archaeological sites can be easily collected at this time.

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

05310 NH EDWARD MACDOWELL LAKE

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

Edward MacDowell Lake project area has not been subjected to an archaeological reconnaissance/inventory survey in order to determine the presence or likelihood of significant historic and archaeological resources.

Criteria (What is the actual requirement?)
C.5.1. All Federal agencies are required to establish a program to locate, inventory, and nominate to the SOI all properties under the agency's ownership or control that appear to qualify for inclusion on the National Register of Historic Places (36 CFR 60.9).

Suggested Solutions:
Currently, an archaeological reconnaissance/inventory survey is scheduled for FY 99. At completion of survey, NAE will better be able to manage cultural resources on their property and plan for future evaluation and intensive studies.

Comments:
Concurrently with the completion of the archaeological recon surveys, NAE has also begun the preparation of Historic Properties Management Plans (HPMP) for all projects. These plans will document cultural resources on each project, means of protection, and future plans of management and further evaluation.

HAZARDOUS MATERIALS MANAGEMENT

No Findings

HAZARDOUS WASTE MANAGEMENT

No Findings

NATURAL RESOURCES MANAGEMENT

INDIVIDUAL FINDING SHEET

05310 NH EDWARD MACDOWELL LAKE

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

The Environmental Assessment (EA) for project operation and maintenance does not adequately describe existing resources, activities, or impacts.

Criteria (What is the actual requirement?)

An updated EA/FONSI assessing impacts of project operation and maintenance on natural and cultural resources is necessary to comply with the intent of the National Environmental Policy Act (NEPA).

Suggested Solutions:
Update the project EA.

Comments:
The Project Manager has scheduled an update of the EA for FY 99.

INDIVIDUAL FINDING SHEET

05310 NH EDWARD MACDOWELL LAKE

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

The project has not been surveyed for rare/protected species or significant plant communities.

Criteria (What is the actual requirement?)
NR.9. Emphasis should be placed on the maintenance and restoration of habitat favorable to the production of indigenous fish and wildlife.

ER 1130-2-540 (2-2) OPMs are responsible for the completion of natural resources inventories on Corps civil works projects. Level One inventories include the presence of "special status species" and/or their critical habitat.

Suggested Solutions:
Conduct survey of project for rare/protected species and rare plant communities. Develop management plan to protect rare species and communities.

Comments:
The Project Manager has scheduled the completion of the survey in FY 99 and the management plan in FY 00.

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

05310 NH EDWARD MACDOWELL LAKE

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

Wetlands at the project have not been identified.

Criteria (What is the actual requirement?)
NR.10.2. Floodplains and wetlands should be identified and protected.

Suggested Solutions:
Map wetlands and wetland community types.

Comments:
The Project Manager has scheduled wetland mapping for FY 99.

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

05310 NH EDWARD MACDOWELL LAKE

Type of Finding: NEGATIVE Finding Category: MANAGEMENT PRACTICE

Condition (What did you find?)

Periodic inspections and other operation and maintenance activities require closure of gates and reduction in outflow to very low levels. Flows are usually restricted to less than one hour. Reservoir control plans do not include measures to minimize impacts of gate closures on downstream aquatic life.

Criteria (What is the actual requirement?)
NR.9. Emphasis should be placed on the maintenance and restoration of habitat favorable to the production of indigenous fish and wildlife.

Suggested Solutions:
Reservoir control plans should include an SOP to assure that planned (non-emergency) closures for routine inspections and maintenance are conducted in a manner which minimizes impacts to downstream aquatic life. Non-emergency inspections and maintenance of the conduit should be scheduled during low flow periods and during early morning or late afternoon to minimize stream warming. Flows should be reduced gradually to minimize stranding of downstream aquatic life.

Comments:
The downstream impacts on biological resources associated with non-emergency closures will be addressed in the Environmental Assessment. Coordination with state and Federal resource agencies will be included.

OTHER ENVIRONMENTAL ISSUES

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

05310 NH EDWARD MACDOWELL LAKE

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

A pollution prevention plan and waste reduction worksheet are not available at the project.

Criteria (What is the actual requirement?)
04.5.1. Installations/ CW facilities are required to prepare pollution prevention plans by 31 December 1995 (EO 12856, Section 3-302(d)).

Suggested Solutions:
These documents must be available for inspection at the project, at all times. The waste reduction worksheets must be updated annually by 31 December.

Comments:
The pollution prevention plan has been completed. Its unavailability subsequently lead to a failure to provide an updated waste reduction worksheet.

PESTICIDE MANAGEMENT

No Findings

PETROLEUM, OIL AND LUBRICANT MANAGEMENT

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

05310 NH EDWARD MACDOWELL LAKE

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

The project does not perform mock spill or training events for potential petroleum and hazardous substances discharges (spills) in accordance with approved Spill Prevention, Control, and Countermeasures Plan and Spill Contingency Plan (SPCCP/SCP).

Criteria (What is the actual requirement?)
PO.10.3. Facilities that are required to have a response plan are also required to develop and implement a facility response training program and a drill/exercise program that meet specific parameters (40 CFR 112.21).

Suggested Solutions:
Perform mock spill event and training exercises. The Project Manager reported that he and his staff had participated in a mock spill exercise for the Merrimack River Basin. This activity should be project specific and conducted at Edward MacDowell Lake.

Comments:
The Project Manager should continue the facility response training program, ensuring that all permanent project staff has attended first responder training, and that a drill/exercise program is implemented.

SOLID WASTE MANAGEMENT

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

05310 NH EDWARD MACDOWELL LAKE

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

An uncertified dump, containing asphalt debris, is located along the east side of Ed MacDowell Lake (see Appendix C).

Criteria (What is the actual requirement?)
SO.3.1. Installations/ CW facilities are required to comply with state and local solid waste regulations concerning solid waste management (EO 12088, Section 1-1).

Suggested Solutions:
Complete removal and disposal of the asphalt debris. After removal, the area should be graded appropriately, if necessary, and revegetated.

Comments:
Partial removal of a larger asphalt pile left this pile remaining.

STORAGE TANK MANAGEMENT

No Findings

TOXIC SUBSTANCES MANAGEMENT

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

05310 NH EDWARD MACDOWELL LAKE

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

Floor tiles, located in an utility building and identified as containing friable asbestos, have not been removed (see Appendix C). Pipe elbows in the project office have also been identified as asbestos-containing materials.

Criteria (What is the actual requirement?)
T2.2. Facility buildings with the potential to be contaminated with asbestos should be tested and surveyed for asbestos and friable material. Any identified friable asbestos material must be removed.

Suggested Solutions:
Have the friable asbestos-containing floor tiles removed by a licensed contractor. Other asbestos-containing material should be identified and labelled.

Comments:
The Project Manager has scheduled the removal of the floor tiles in FY 97 as part of a larger asbestos removal contract.

WASTEWATER MANAGEMENT

No Findings

Wastewater Management

Narrative-

The external inspection of Edward MacDowell Lake was carried out on 24 April 1997. After meeting at the project office, we toured part of the project. There has been no change in wastewater disposal at the project.

Resolution of Past Findings

Minor Deficiency. There were floor drains in vehicle storage areas. These floor drains have been permanently sealed.

Findings

No deficiencies were found relating to wastewater disposal during this external assessment.

WATER QUALITY MANAGEMENT

No Findings

(7) Forward a report of evaluation, which may indicate a

Water Quality Management

Narrative-

The external inspection of Edward MacDowell Lake was carried out on 24 April 1997. After meeting at the project office, we toured part of the project. There has been little change in water quality at the project.

Resolution of Past Findings

Minor Deficiency. The public water supply wells at the project were not registered with New Hampshire. These wells are now registered. New Hampshire does not require transient noncommunity wells to have certified water supply operators.

Minor Deficiency. Results of routine monitoring of potable water sources were not reported to the State within 24 hours. The NED Lab now regularly reports testing results for public water supplies to the States within 24 hours.

Findings

No deficiencies were found relating to water quality during this external assessment.

NEW ENGLAND DISTRICT
ERGO TEAM

Bruce Williams - Program Manager
Construction-Operations Division - Operations Technical Support Section

Jeff Deyette - ERGO Team Leader
Construction-Operations Division - Operations Technical Support Section

Joseph Horowitz
Engineering-Planning Division - Environmental Resources Section

Marc Paiva
Engineering-Planning Division - Environmental Resources Section

Townsend Barker
Engineering-Planning Division - Water Quality Management Branch
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The ERGO Team would like to thank the following individuals who participated in the pre-assessment evaluation, field inspection and/or in the research and evaluation of environmental compliance guidance:

Ed MacDowell Lake

David Shepardson - Project Manager
Jason Trembley - Park Ranger

APPENDICES

APPENDIX A:
Previsit Questionnaires

Table 1

ERGO PREVISIT QUESTIONNAIRE (PVQ)

This questionnaire will provide background information necessary to plan and conduct an environmental compliance assessment. Additionally it provides insight for properly designing the composition of expertise on the assessment team.

Name of Facility: [illegible]
Environmental POC: [illegible]
Telephone Number: [illegible]

	RESPONSE	REFERENCE IN TEAM
Section 1. Air Emissions Management		
1. Does the facility have any air permits to maintain with state regulatory authority (i.e. boilers, pathological incinerators, operating or construction permits, paint spray booths, POL tank vents, etc.)? Inclusively list the types and numbers of each: Type of Permit ______ Quantity ______	No	If YES, see checklist item A.1.3
2. Does the facility operate a fuel burner (central steam plant or hot water steam boiler)? If YES, how large and what fuel is used? Size ______ Fuel ______	No	If YES, see checklist item A.10.1 through A.10.10
3. Does the facility operate an incinerator (i.e., for classified documents, solid waste, sewage sludge, etc.)? If YES, please list type and number. Type ______ Number ______	No	If YES, see checklist item A.25.1 through A.25.3 and A.41.1 through A.45.8
4. Does the facility operate fuel dispensing facilities? How many? ______	No	If YES, see checklist item A.55.1 through A.55.6
5. Does the facility use any volatile organic compound (VOC) based solvent degreasers?	______	If YES, see checklist item A.1.3

	RESPONSE	REFERENCE IN TEAM
6. Does the facility operate maintenance shops?	yes	If YES, see checklist item A.1.3, A.85.1 through A.95.2

Type	Quantity
Wheeled	2
Tracked	
Aircraft	

Please list any additionally shop activities that generate any form of air pollution (i.e., vehicle emissions systems, ventilation systems for various operations, etc.)

_____

_____

_____

7. Does the facility operate equipment or processes that could lead to fugitive emissions of vinyl chlorides or benzene?	NO	If YES, see checklist item A.65.1 through A.65.7
What types of equipment? _____		
8. Does the facility procure/use chlorofluorocarbons (CFC) or halon substances?	[illegible]	If YES, see checklist item A.85.1 through A.85.4
9. Does the facility repair any units containing refrigerant?	NO	If YES, see checklist item A.90.1 through A.95.2
10. Does the facility recycle/reclaim CFCs or halon?	[illegible]	If YES, see checklist item A.90.1 through A.95.2
11. Does the facility have any vapor emissions requirements for oil/water separators that have been imposed upon them.	NO	If YES, see checklist item A.1.3

	RESPONSE	REFERENCE IN TEAM
Section 2. Cultural Resources Management		
1. Does the facility have any cultural resources eligible for or that are currently listed in the National Register of Historic Places?	NO	If YES, see checklist item C.5.1 through C.5.3
2. Are their any cultural resources (archeological sites, buildings over 50 yr old) that have not been evaluated for the National Register?	NO Scheduled FY09	If YES, see checklist item C.5.1 through C.5.3
3. Does the facility Master Plan contain a cultural resources overlay that is utilized for planning purposes?	NO	If YES, see checklist item C.5.1.1
4. Is there an on-staff Cultural Resources Coordinator?	NO	See Supplement
5. If not, does a staff person have cultural resources as "other duties as assigned"?	YES	See Supplement
6. Does the facility have any archeological artifacts in storage?	NO	If YES, see checklist item C.20.1 through C.20.9
7. Does the facility have in storage, or know of, any locations of Native American burials, cemeteries, or human remains?	NO	If YES, see checklist item C.15.1 through C.15.2
8. Are there any areas on the facility considered to have religious importance to any Native American Tribe?		If YES, see checklist item C.10.1

	RESPONSE	REFERENCE IN TEAM
Section 3. Hazardous Materials Management		
1. Has the facility conducted training for individuals working with hazardous materials?	YES	If YES, see checklist item HM.10.1 through HM.10.2
2. Does the facility have an Oil and Hazardous Substances Contingency Plan (OHSCP)?	YES	If YES, see checklist item HM.1.3
3. Does the facility store any extremely hazardous substances?	NO	If YES, see checklist item HM.25.1
4. Does the facility store at one time 10,000 lb or more of any hazardous substances that requires a Material Safety Data Sheet (MSDS) (fuel is a hazardous substance which requires an MSDS)? (NOTE: Using water as a basis of measurement, 10,000 lb is approx. 1,250 gal.) Please list substances _____ _____ _____	NO	If YES, see checklist item HM.30.1 through HM.30.3
5. Does the facility store any flammable/combustible liquids?	YES	If YES, see checklist item HM.35.1 through HM.40.3
6. Does the facility store any compressed gases?	YES	If YES, see checklist item HM.45.1

	RESPONSE	REFERENCE IN TEAM
Section 4. Hazardous Waste Management		
1. Is the facility a generator of hazardous waste?	NO	If YES, see checklist item HW.10.1 through HW.10.2
2. Does the facility generate less than 100 kg [220.46 lb, approx. 28 gal] of hazardous waste in 1 mo?	YES	If YES, see checklist item HW.15.1 through HW.15.6
3. Does the facility generate more than 100 kg [220.46 lb, approx. 28 gal] but less than 1000 kg [2204.62 lb, approx. 273 gal] of hazardous waste in 1 mo?	NO	If YES, see checklist item HW.20.1 through HW.45.5
4. Does the facility generate more than 1000 kg [2204.62 lb, approx 273 gal] of hazardous waste in 1 mo?	NO	If YES, see checklist item HW.55.1 through HW.90.6

	RESPONSE	REFERENCE IN TEAM

(NOTE: Any waste which is not excepted, which is listed in 40 CFR 261, or which exhibits the following characteristics is a hazardous waste:

- Ignitability (flash point <140 F) or
- Corrosivity (pH < 2 or > 12.5) or
- TCLP Toxicity (for As, Ba, Cd, Cr, Pb, Hg, Se, Ag, and selected pesticides or
- Reactive. (or CN).)

The following are hazardous wastes that may typically be found at a facility (check if used at this facility and indicate amount used):

- Solvents _____

(This includes trichloroethane, Methylene, Chloride, Tetrachloroethylene, 1,1,1 Trichloroethane, Carbon tetrachloride, Chlorinated Fluorocarbons, Toluene, MEK, Mineral spirits, and Xylene.)

- Liquid paint 52 Gal.
- Paint stripper, remover or thinner Paint Thinner 5 Gal
- Spray paint booth air filters 50 12 Fl. oz Cans
- Pesticides, insecticides, herbicides _____
- NRC filters and test kits _____
- Super tropical bleach _____
- Ordnance, ammunition, explosives and residues _____
- Battery acid and caustics in unserviceable batteries 7 Batteries
- Pharmaceuticals _____
- POL tank farm fuel system filters _____
- De-icing solution _____
- Printing ink, ink solvents, and cleaners _____
- Absorbent material and soil contaminated with hazardous waste _____
- Other _____
- Other _____
- Other _____

5. What Hazardous Waste permits have been applied for? NONE — If any, see checklist item HW.1.3

   Part A
   Part B
   Interim Status
   None needed

6. Does the facility accept wastes from other facilities for treatment, storage, or disposal? NO — If YES, see checklist item HW.105.1 through HW.170.5

7. Does the facility operate accumulation points? NO — See checklist items based on how much is generated
   How many?_____
   Where?_____
   _____

	RESPONSE	REFERENCE IN TEAM
Section 5. Natural Resources Management		
1. Does the facility have any outdoor recreation areas? (i.e., athletic fields, walking/hiking tracks, off-road vehicles tracks, etc.)	_____	If YES, see checklist item NR.1.3
2. Does the facility have a plan for managing its natural resources?	_____	See Supplement
3. Are there any areas on the facility that have:	_____	If YES, see checklist item NR.10.1 through NR.10.3
A. Wetlands? If so, are they permitted/regulated by definition?		
B. Flood Plains? 25-yr _____ 50-yr _____ 100-yr _____		
C. Shoreline? _____		
D. Forests? _____		
4. Has a survey to locate and identify threatened and endangered species and critical habitats been initiated?	NO	If YES, see checklist item NR.20.1 through NR.20.3
5. Does the facility have any endangered species on its property?	NO	If YES, see checklist item NR.20.1 through NR.20.3

	RESPONSE	REFERENCE IN TEAM
8. Does the facility operate satellite accumulation points? How many? _____	NO	See checklist items based on how much is generated
9. Does the facility treat hazardous waste onsite? How and where? _____	NO	If YES, see checklist item HW.105.1 through HW.255.3
10. Does the facility store (temporary or long term) hazardous waste onsite at other than an accumulation point? Where? _____	NO	If YES, see checklist item HW.105.1 through HW.255.3
11. Does the facility dispose of hazardous waste onsite? How and where? _____		If YES, see checklist item HW.105.1 through HW.255.3

	RESPONSE	REFERENCE IN TEAM
Section 6. Other Environmental Issues		
1. Has the facility recently (within the past 5 yr) prepared, or is it in the process of preparing, and environmental assessment (EA) or environmental impact statement (EIS)?	NO	If YES, see checklist item O1.1.1 through O1.5.14
For current mission?		
For future Master Plan?		
Any construction projects, timber sales, etc.?	NO	
2. Does the facility have any operations that produce environmental noise or noise that goes outside the facility (i.e.,ranges, skeet ranges, helicopter pad, generators, highway transportation)?	NO	If YES, see checklist item O2.1.1 through O2.1.3
3. Is the facility engaged in any real property transaction?		If YES, see checklist item O5.1.1 through O5.1.3 and see Supplement

	RESPONSE	REFERENCE IN TEAM
Section 7. Pesticide Management		
1. Does the facility use pesticides? Contractor application? _____ In-house application? _____ Both contractor and in-house application? _____	NO	If YES, see checklist item PM.5.1 through PM.20.2
2. Are any pesticide wastes disposed of at the facility?	NO	If YES, see checklist item PM.55.1
3. Are pesticides stored on the facility? Please list locations. _____ _____ _____	NO	If YES, see checklist item PM.45.1 through PM.45.2
4. What are the pesticides used at the facility? (Attach a separate list if necessary) _____ _____ _____ _____	NO	NA
5. Are pesticides used at offsite satellite facilities?	NO	If YES, see checklist item PM.5.1 through PM.45.2
6. Does the facility maintain a pesticide/entomology shop? If YES, is it permitted by the state?	NO NO	If YES, see checklist item PM.45.1 through PM.45.2
7. Is there an annual inventory available for review?		See Supplement

	RESPONSE	REFERENCE IN TEAM
Section 8. Petroleum, Oil, and Lubricant (POL) Management		
1. Does the facility have a current (3 yr old or less) Spill Prevention Control and Countermeasure (SPCC) plans?	YES	If YES, see checklist item PO.5.1 through PO.5.7
2. Is the SPCC/ISC exercised annually (mock spill events conducted)?	NO	If YES, see checklist item PO.5.1 through PO.5.7
3. Does the facility store used oil?	NO	If YES, see checklist item PO.60.1 through PO.90.1
Where? _____		
4. Does the facility have any pipelines?	NO	If YES, see checklist item PO.40.1 through PO.40.10
5. Does the facility operate any service stations?	NO	If YES, see checklist item PO.45.1 through PO.45.4

	RESPONSE	REFERENCE IN TEAM
Section 9. Solid Waste Management		
1. Does the facility have a solid waste management facility onsite?	NO	If YES, see checklist item SO.30.1 through SO.95.2
TYPE NUMBER		
Landfill _____		
Incinerator _____		
Transfer Point _____		
2. Does the facility contract out the collection of its solid waste?	No	If YES, see checklist item SO.10.1 through SO.10.6
3. Does the facility have a:	YES	If YES, see checklist item SO.25.1 through SO.25.4
solid waste recycling program? List commodities recycled: Aluminum cans - Office		
Construction debris landfill:		
Is it permitted?	YES	
Operated by: _____		
4. Is waste transported offsite for disposal?	Yes	If YES, see checklist item SO.1.3
In landfills? _____		
In incinerators? _____		
Transfer Stations? _____		
Recycling plant? _____	NO	
5. Does the facility dispose of ash residue or sludge:		If YES, see checklist item SO.1.3
Offsite? _____	N/	
Onsite? _____		
6. Does the facility receive refuse from outside the United States?	_____	If YES, see checklist item SO.100.1
If YES, is laboratory testing performed? _____	NO	
7. Does the facility operate battery shops, including charging areas within vehicle maintenance facilities?	_____	If YES, see checklist item SO.1.3
If YES, how many? _____		

	RESPONSE	REFERENCE IN TEAM
Section 11. Toxic Substances Management		
1. Has the facility conducted a survey for PCBs?	YES	If YES, see checklist item T1.10.1 through T1.10.3
2. Are PCBs or PCB-contaminated oils in use or stored at the facility in:	NO	If YES, see checklist item T1.20.1 through T1.20.9 and T1.30.1 through T1.35.1
Transformers_____ Capacitors_____ Electromagnets_____ Heat Transfer or Hydraulic Systems_____ Circuit Breaker_____ Fluorescent Light Ballasts_____ Other_____		
3. Does the facility dispose of PCBs or PCB items at the facility	NO	If YES, see checklist item T1.50.1 through T1.50.11
4. Does the facility transport PCBs	NO	If YES, see checklist item T1.45.1 through T1.45.2
5. Has the facility conducted a complete facility-wide asbestos survey?	YES	See Supplement
6. Does an Asbestos Management Plan exist?		See Supplement
7. Is maintenance done on items insulated with asbestos?		If YES, see checklist item T2.5.1 through T2.10.1
8. Has the facility undergone any asbestos removal projects in the past?	YES	If YES, see checklist item T2.5.1 through T2.10.1
How long ago? 2 yrs By contract or in-house? Contract		
9. Is there any asbestos on the facility that has been removed and is awaiting disposal?	NO	If YES, see checklist item T2.15.1 through T2.15.4
10. Will the facility have any demolition, remodeling, or renovation projects underway at the time of the assessment?	NO	If YES, see checklist item T2.5.1 through T2.10.1
Please identify those projects and buildings. _____ _____		

and subjective

(1) Establish nomination criteria thresholds

	RESPONSE	REFERENCE IN TEAM

Section 10. Storage Tank Management

1. Does the facility have aboveground storage tanks (ASTs) used for the storage of petroleum products or hazardous waste?
   (Attach additional page if necessary)

   Response: ________ — If YES, see checklist item ST.5.1 through ST.20.3 and ST.100.1 through ST.150.2

Location	Substance	Capacity
[illegible]	[illegible]	15 Gal

2. Does the facility have any USTs?

   Response: ________ — If YES, see checklist item ST.25.1 through ST.95.7

Location	Quantity	Size	Material Stored	Permitted
[illegible]	[illegible]		[illegible]	
[illegible]	[illegible]		[illegible]	

   (Attach a separate inventory sheet if necessary)

3. Does the facility have any USTs out-of-service or abandoned?

   Response: ________ — If YES, see checklist item ST.95.1 through ST.95.7

4. Is there a program in place to manage unserviceable/abandoned tanks?

   Response: ________ — If YES, see checklist item ST.95.1 through ST.95.7

	RESPONSE	REFERENCE IN TEAM
Section 12. Wastewater Management		
1. Does the facility have a National Pollutant Discharge Elimination System (NPDES) and/or State Pollutant Discharge Elimination System (SPDES) permit? Identify the types of discharges:	NO	If YES, see checklist item WA.10.1 through WA.10.6
Stormwater runoff permits?		
Drainage water from dredge and fill materials?		
Wastewater treatment plant?		
How many and what size?		
Process wastewater?		
Heat/Power production cooling blowdown water?		
Stormwater runoff from fuel dispensing areas, airfields, and parking lots/aprons and maintenance facilities?		
Vehicle wash facilities? How many?		
Plating shops?		
Does the facility maintain sedimentation holding ponds or seepage pits from vehicle/aircraft washing, maintenance shop drainage (shop operations and motor parks), and other activities?		
Operate cooling towers and pass through water?		
Septic Systems?		
Fresh water wetlands?		
Industrial waste system/discharge?		
Lines which bypass treatment structures?		
Other?		
2. Does the facility discharges into a publicly owned treatment works (POTW) any of the following?	NO	If YES, see checklist item WA.10.1 through WA.25.9
Process wastewater?		
Domestic (sanitary) wastewater?		
Industrial wastewater treatment plant effluent?		
Other?		
3. Are there any discharge bypass lines in the system?	NO	If YES, see checklist item WA.25.1 through WA.25.9
4. Does the facility have any sludge disposal areas from vehicles/equipment washing operations?		If YES, see checklist item WA.1.3
Is the sludge analyzed or characterized on a scheduled frequency prior to disposal?		
5. What percent of vehicle maintenance is performed by contract?		If YES, see checklist item WA.1.3
Is it performed onsite or offsite?		

	RESPONSE	REFERENCE IN TEAM
11. Is asbestos material removed by contract or in-house personnel?	YES	If YES, see checklist item T2.10.1
12. Does the facility monitor for radon gas?	YES	If YES, see checklist item T3.1.1 through T3.1.3
13. Is there a program to reduce radon threat?	NO	See Supplement
14. Has the facility populace been informed of the final status?	YES	See Supplement
15. Is the facility performing any lead based paint removal?	NO	If YES, see checklist item T4.1.1 through T4.1.3

	RESPONSE	REFERENCE IN TEAM
Section 13. Water Quality Management		
1. Does the facility operate a public drinking water system?	YES	If YES, see checklist item WQ.10.1 through WQ.30.3
2. Does the facility maintain wellheads?	YES	If YES, see checklist item WQ.1.3
3. Does the facility operate an underground injection well?	I.C	If YES, see checklist item WQ.1.3
4. Are there groundwater aquifers on the facility?	NO	If YES, see checklist item WQ.95.1
Are they in use? _____	NO	
5. Is the facility located on a sole source aquifer?	NO	If YES, see checklist item WQ.95.1
6. Are protective or preventative measures in place to prevent contamination of these aquifers?	NO	If YES, see checklist item WQ.95.1
7. Are field water purification units used?	NO	See Supplement

How is the backwash managed from these mobile units?

_____

_____

_____

_____

Signature of individual completing this form: James W. Hollund

Date completed: 12-23-96

APPENDIX B:
Special Emphasis Areas List

To Basin Manager, NRB, TRB, MRB, UCRB

We have identified a few environmental compliance issues that will be emphasized during the upcoming FY 97 ERGO external assessment. These special emphasis areas include:

- Ozone depleting substances
  Review elimination plan and status of funding.

- Pollution Prevention Plan
  Check Basin strategies and project waste reduction worksheets.

- Hazardous waste manifest training
  Check to see if project employees have completed training and are designated.

- Very small systems operator training (water supply wells)
  Check to see if project staff meets current training requirements.

- Annual mock training for spill plans
  Review schedule of annual mock spill training exercises.

- Acquisition of spill materials
  Check to see if project spill materials are consistent with spill plan.

- Review of ASTs and USTs
  Check current tank status and review specs to meet EPA's spill, overflow and corrosion protection regulations.

- Underground injection control wells (UIC).
  Check to see that floor drains have been permanently sealed or connected to the septic system.

- Clean Air Act Title V permits
  Review calculations for determining the need for a permit.

Please provide any available documentation that you may have concerning these subjects with your completed Pre-Visit Questionnaire (PVQ). If you have already returned your PVQ to New England Division, we will look for the necessary information during the site visit.

Jeff Deyette
Operations Technical
Support Division

APPENDIX C:
Photographs

Photo #1: Unverified dump, containing asphalt debris, located along the east side of Edward MacDowell Lake.

Photo #2: Floor tiles, located in an utility building, that have been identified as containing friable asbestos material.